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To: Rick Breitenbach, CALFED

From: Douglas Morrison, USFWS
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Subject: U.S. Fish and Wildlife Service Comments on Phase II Interim Report Technical Appendix to CALFED PEIS/EIR (Draft March 1998)

Date: 30 June 1998

USFWS thanks CALFED for the opportunity to review and comment on the Phase II Interim Report Technical Appendix to the CALFED PEIS/EIR (Draft March 1998). Our comments and recommendations follow. If you have any questions, please contact And Hamilton at 979-2710.

Page 29: Average Monthly Delta Outflow graph:

Comment: This graph seems to be in error. Records of Delta outflow show it peaking in May, not in January, February, or March.

Page 27-33: System Variability and the Time Value of Water:

Comment: We recommend that this section include a discussion of water systems operations, yield, risk or "reliability," and the "time value of water" as it is expressed in real dollars, including real delivery costs, the prices paid by users, and any relevant seasonal patterns of use. The discussion should include a brief description of how water systems are currently operated, and how the program proposes to operate them in the future. It should include a summary of how much water from various sources goes where, to whom, at what cost, and for what purposes, and a summary of how the program proposes to change this.

Page 30: text and Sacramento River Flow graph:

Comment: The three peak Sacramento River flows described as being "very important to ecosystem health" are about 90,000 cfs, 120,000 cfs, and 150,000 cfs. There is nothing, however, in the program description suggesting that these flow peaks in the Sacramento River would be approximated as a result of any program action.

Page 34-35: Adaptive Management:

Comment: The picture on page 35 of four circles within a circle surrounded by

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labeled arrows is unclear. Most of the confusion may result from the fact that the "indicators" circle is categorically dissimilar to the other three circles and to the labeled arrows. The "indicators" label refers to a set of species or physical conditions that are supposed to indicate the state of an ecosystem, while all the other labels refer to actions or processes, and the majority of these processes act on or are otherwise inseparable from indicators.

In addition, there is a general lack of clarity in the adaptive management text, which covers many topics but does not describe any process or plan for proceeding, and does not describe a management process. We recommend this section include a description of adaptive management and how it will be applied to the proposed program.

Page 119: Alternative 2 section, last sentence: "While CALFED believes measures can be found to provide adequate passage, difficulties have occurred elsewhere in providing adequate upstream passage for multiple species."

Comment: We suggest including an explanation of why CALFED believes measures can be found to provide adequate passage.

Page 120: Diversion Effects on Fisheries graph:

Comment: The "qualitative assessment" of diversion effects shown in the graph is contradicted in the text. The discussion on page 119 says that Alternative 1 would be worse than existing conditions; the second full paragraph on page 120 states that many fishery experts agree that there is little overall difference between Alternatives 1 and 2. Yet the bar graph shows these negative impacts as halfway between "good" and "better," and more than half the distance toward "best." If the height of the bars for Alternatives 1 and 2 represent a slightly worse condition than no action, then the bar for Alternative 3 must represent an exceedingly small improvement. It is important that this apparent contradiction be clarified as differences among diversion effects is one of the two major criteria for an alternative selection.

Page 123: first paragraph, first sentence: "The overall qualitative assessment of fishery experts is that Alternative 3 performs better than Alternatives 1 and 2."

Comment: Similar reports of consensus among "fishery experts" are made several other places in the report. These references should provide more detail on who the fishery experts are, and how or where their opinions were expressed.

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Page 133: Summary Evaluation of Most Significant Technical Distinguishing Characteristics table:

Comment: This table showing the summary evaluation of distinguishing characteristics does not agree with the conclusions drawn from it in the text. The table does not show that export water quality and diversion effects are the two key distinguishing characteristics, as indicated in the text, but rather, that effects on operational flexibility and risk reduction are more distinguishing than diversion effects. Since this appears to be one of the most important judgements made in the CALFED process so far, it is essential that the evaluation of distinguishing characteristics be clarified.

Page 139: Implications of the Delta Decision on Diversion Effects on Fisheries Recovery, paragraph 3:

Comment: The statement that some species, including longfin smelt and bay shrimp, "are potentially affected by changes" in outflow is too mild. The populations of these species are clearly related to Delta outflow, and this relationship provides much of the basis for existing water quality regulation in the Delta.

Page 139-146: Implications of the Delta Decision on Diversion Effects on Fisheries Recovery:

Comment: This section on effects of Delta flow patterns fails to consider the fact that a large diversion at Hood would increase the percentage of Sacramento River flow into Georgiana Slough and would consequently increase mortalities of Sacramento River chinook salmon, including winter-run chinook and spring-run chinook, and possibly of steelhead trout. This is a serious potential drawback to Alternatives 1 and 2, and although it is noted in the body of the Programmatic EIS/EIR it does not appear to have been considered in the analysis of distinguishing characteristics.

This report is intended to provide background relevant to distinguishing differences among alternatives. However, in general, where negative impacts must be reported it tends to downplay them with references to hoped-for improvements from the common programs. This tends to obscure differences rather than clarify them.

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The discussion of the possibility that all alternatives will end up with more detrimental effects than benefits again contradicts the graph on page 120 showing all alternatives as overall improvements. The list of unanswered questions to be addressed by the recognized experts contradicts the finding in the draft Programmatic EIS/EIR that diversion effects are mitigable.

Page 149: Developing a Consensus Assurances Package, paragraph 1:

Comment: It is unclear from the text what the 1982 debate on the peripheral canal showed about assurances. If the debate is relevant, we recommend including a brief summary.

Page 150: Third bullet:

Comment: The statement that program elements outside the control of CALFED should be done quickly to reduce the risk of involvement of outsiders is not clear. We recommend including a description of who the "outside actors" are, and why their involvement is considered risky.